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U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

DEPT. OF TRANSPORTATION

01 JAN 24 AM 11:57

Memorandum

Subject: Meeting with RMA

Date: JAN 23 2001

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Senior Attorney

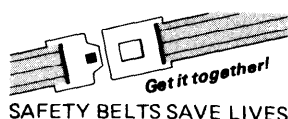
Reply to
Attn. of:

To: Docket No. NHTSA 2001-8677; Notice 1 -4

Representatives of the Rubber Manufacturers Association (RMA) met with NHTSA representatives on January 18, 2001, to discuss their preliminary thoughts on data submissions under the early warning requirements of the TREAD Act. Present for RMA were Donald B. Shea, its president and CEO, and John G. DeGooyer of Hopkins & Sutter, RMA's outside counsel. Also present was Ann Wilson of RMA. NHTSA was represented by Kenneth Weinstein, Kathy DeMeter, and from her staff, George Person, Jeff Quandt, John Ridgley, Richard Boyd, and Tom Cooper. The writer of the memorandum was also present. The meeting was held in the conference room of Room 5326 from 10:00 to 10:55 a.m.

RMA had requested the meeting earlier in January to express its preliminary thoughts about the coding and submission of early warning reporting data and information. Although possessing copies of the publicly available ANPRM, posted at the Federal Register before the meeting, RMA had not come to discuss it but to relate its efforts among its seven member tire manufacturers to develop a common matrix to report the information required by the Act.

RMA emphasized the importance of definitions in ensuring consistency of the information to be kept by its members and to be reported to NHTSA. Mr. DeGooyer said that RMA is trying to see whether individual manufacturer codes can be standardized into a common system. He asked if it would be helpful if RMA suggested a tire warranty system code (Ms. Wilson having pointed out that warranty data for truck tires is treated differently than for passenger cars). Mr. Person replied that a common system should not represent the least common denominator of information. Ms. Wilson said that a common system seemed to be a goal that was achievable, and that RMA's member companies would be pursuing this possibility in the near future, in time to submit comments to the ANPRM.



Mr. DeGooyer mentioned briefly the possibility of using Excel spreadsheets, and raised the possibility of having separate reports for injuries, Mr. Quandt observing that it takes longer for companies to get claims data than for warranties. Mr. Weinstein remarked that NHTSA might want to get detailed data on individual claims, but, for warranties, only the numbers. At present, NHTSA doesn't know how industry uses data to identify potential problems.

Returning to the theme of definitions, Ms. Wilson remarked that raw data could be confusing without a common understanding of such terms as "tread separation."

Mr. Quandt observed that a matrix might have to be subdivided into original equipment passenger car tires, replacement passenger car tires, original equipment truck tires, replacement equipment truck tires, etc.

Mr. Weinstein raised the issue of whether requiring vehicle manufacturers to submit data on original equipment tires would create the possibility of duplication with information submitted by the manufacturers of the tires. Ms. Wilson observed that tire manufacturers are more likely to hear about problems in their tires than vehicle manufacturers are.

Mr. DeGooyer raised the question of thresholds for reporting information and Mr. Weinstein replied that that was under consideration.

Mr. Shea closed the meeting by saying that RMA will provide NHTSA with the input derived from meeting with its member companies. Mr. Weinstein asked that the issue of foreign tires be considered as well, e.g., what tires are "substantially similar," how records are kept in Japan and Europe, and Mr. Shea said that they would be addressed.

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